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VIA ECF

October 31, 2023

Hon. Victor Marrero
United States Courthouse
500 Pearl St.
New York, NY 10007-1312

Re: *Baliga, et al. v. Link Motion Inc., et al.*, Case No. 1:18-cv-11642-VM-VF (S.D.N.Y.)

Dear Judge Marrero:

We represent Dr. Vincent Wenyong Shi (“Dr. Shi”). We write to request leave to supplement Dr. Shi’s objections to the August 11, 2023 Report & Recommendation of Magistrate Judge Valerie Figueredo. The basis for this request is that the Receiver did not timely serve on Dr. Shi’s counsel copies of underlying attorney invoices and other records (the “Records”)¹ that are the subject of the fee application in his November 18, 2022 accounting. The Records were originally filed under seal *ex parte*. See ECF No. [378-4](#); [484](#) ¶¶24-25. They were not unsealed and served on Dr. Shi until October 13 and 24, 2023, after Dr. Shi’s objections to the R&R were filed. See ECF No. [474](#); [484](#) ¶¶24-25. Accordingly, Dr. Shi has only recently had an opportunity to contest the contents of the Records. Upon review of the Records, Dr. Shi asserts that there are additional grounds on which the Court should disallow the Receiver’s fee claims. Dr. Shi’s additional grounds are set forth the Supplemental Objections being contemporaneously filed with this letter.

Accordingly, Dr. Shi respectfully requests that the Court consider the accompanying Supplemental Objections to the August 11, 2023 Report & Recommendation. I have notified counsel for the Receiver and Plaintiff of this request and as of the time of filing, I have not received a response.

Respectfully submitted,

/s/ Michael James Maloney

Michael James Maloney

cc: All counsel of record (via ECF)

¹ The Records were originally filed under seal on November 18, 2022 at ECF No. [378-4](#) with access restricted to the Court and the Receiver.